

Nevada/California Greater Sage-Grouse Comment Submissions via ePlanning Web Form

Submission ID	Subject	Submission Text
NV_CA-GRSG-I-216362	Opposition to Plan Revisions to Roll-back existing protections	<p>As someone who cares about birds and the places they need, and as a professional biologist who spent their entire 35+ year career in conservation science, I strongly oppose any efforts to weaken the conservation protections in the Bureau of Land Management 's (BLM) sage-grouse land management plans. These birds are part of an iconic western ecosystem, the sagebrush habitat, which supports over 350 species including Golden Eagles and mule deer. They are an important part of our heritage.</p> <p>In 2010, the U.S. Fish and Wildlife Service (FWS) determined that the Greater Sage-Grouse populations were in serious trouble and warranted protection under the Endangered Species Act (ESA).</p> <p>An unprecedented numbers of stakeholders across the West worked for many years on ensuring that sage-grouse management is based on science and good for our local economies. The plans that were agreed to in 2015 led the FWS to reverse its 2010 decision and find the future for sage-grouse was secure: a historic victory for conservation and for collaboration.</p> <p>Instead of amending the plans by weakening protections, pointedly prioritizing oil and gas development over protected species, BLM should focus on engaging communities in the decisions necessary to implement the plans as they are. Give the plans a chance to work. The recently issues Instruction Memoranda generally retreat from the protections set out in previous guidance to field staff in 2016. The first IM, issued in December 2017, reverses existing policy, directing BLM field offices to prioritize oil and natural gas leasing and drilling projects outside of the most sensitive sage grouse habitat. Instead, it states that BLM "does not need to lease and develop outside of [grouse] habitat management areas before considering any leasing and development within [grouse] habitat." The second IM, issued in January 2018, eliminates requirements for public notice and comment "when conditions worsen and there is a need for action" under adaptive management provisions in the grouse plans. It also shortens the public protest period for oil and gas lease sale parcels to 10 days from 30 days</p> <p>If there are any changes that experts deem necessary, these should instead be done via minor plan amendments, also known as "maintenance actions." A complete rewrite is an unnecessary waste of federal resources, and risks upending the official finding made by the FWS that a listing under the ESA is not needed.</p> <p>These federal management plans must keep key elements that biologists believe are necessary to avoid the need for listing the species under the ESA. Specifically:</p> <p>Development on existing leases should be managed per regulations that are currently in place, which limit surface occupancy and disturbance. Years of research leave no doubt that sage-grouse do not do well in close proximity to energy development. More development in the most important habitat will not help conserve the species.</p> <p>Good mitigation policy and practice is one of the best opportunities to achieve sustainable development and conservation goals. Where impacts cannot be avoided or minimized, well-designed compensatory mitigation programs can achieve the multiple-use, sustained yield objectives.</p> <p>Do not strip the fundamental mitigation goal of "net conservation gain" from the plans. A no net loss of habitat merely prevents additional habitat loss and is not adequate to achieve long-term conservation of sage-grouse.</p> <p>Improve plan monitoring and oversight, including providing training to field staff and the necessary incentives to ensure proper implementation. The plans should contain metrics by which conservation success can be measured. Conservation metrics will help in effective management of the habitat and reduce wasting personnel time and limited funds.</p> <p>The plans contain many new provisions that serve as loopholes and exceptions to habitat protections. We need certainty that crucial habitat will be protected to ensure the species thrives into the future. If the revisions are adopted, thousands of wells could move into the species core habitats, potentially leading to a listing of the species as endangered</p> <p>Thank you for considering my comments.</p>
NV_CA-GRSG-I-216697	NV Rural Electric Association's Comments on NVCA DEIS	<p>Please find a PDF document attached from the Nevada Rural Electric Association with comments referencing the Nevada-California Greater Sage-Grouse RMPA-EIS.</p> <p>Always best regards, Richard "Hank" James Executive Director Nevada Rural Electric Association 1894 E. William Street, Suite \$222</p>

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		Carson City, Nevada 89701 (775)275-0439
NV_CA-GRSG-I-216842	Petan Company of Nevada, Inc. Comments	Please see the attached PDF file. A hard copy will also be mailed.
NV_CA-GRSG-I-216844	Reese River Valley LLC, Comments	Please see the attached PDF file. A hard copy will also be mailed.
NV_CA-GRSG-I-216923	Churchill County, Nevada Comments to the Nevada and Northeast California Greater Sage-grouse Draft Resource Management Plan Amendment and Environmental Impact Statement	Please see the attached comment letter from Churchill County, NV.
NV_CA-GRSG-I-216932	Sage Grouse Plan - revised/updated comments	On behalf of Kris, Fred and Patrice Stewart as individuals and DBA Stewart 's Ninety-Six Ranch, LLC, we offer the following revised and updated comments. The Martin Fire wiped out 100% of our BLM allotment (William Stock Allotment), as well as over 6200 acres of our private land (Hardscrabble) including a historic 1920 cabin at the headwaters of Martin creek and all located in what WAS prime sage grouse habitat. All of the concerns we had about fuel levels being left dangerously high (200-1000% normal by BLM 's own estimates) have finally borne the outcome that we most feared, a catastrophic wildfire that took everything we all most cherished. Our ranch has been grazing these lands for 154 years. We predate the federal agencies by many decades and for 5 generations, we have made it our life 's work to carefully manage and better these lands. We have been treated like the enemy for over 5 decades. Our grazing privileges have been reduced by over 70%. The land has not improved as a result of these reductions, it has endured, and so have we. Today, we have a black, charred moonscape, zero sage grouse and the magnificent man-high sage that we so loved, is but a memory that cannot and will not be recovered in our lifetimes. Horrible, nonsensical land management is to blame for this fire, no matter what its ignition source. Leaving fuel loads so incredibly high could have only one result. When we were forced to leave our BLM pastures about 3 weeks before this fire, we had used but 20% of our permitted AUMs. We were forced to vacate because our use dates had ended. Nature does not look at the calendar. Moving forward, the agencies MUST recognize the highly positive effects of livestock grazing on a healthy ecosystem. They must amend seasons of use, amount of use to correspond to conditions on the ground, not a rule book or outdated AOI and ten year agreement. They must treat ranchers as the positive partners they really are, rather than as a problem to be dealt with, and they must manage for a healthy ecosystem, not one specific species. Like it or not, we have a clean slate - well, more accurately, a charred, black slate, but we have a chance to start fresh. If the BLM, USFS and USFWS will use this tragedy to change their focus, finally stand up to rabid environmental groups, and work with public lands users including ranchers, the new sagebrush steppe that we can build will be healthy, productive and far more weed free than anything we have seen in decades. Let 's restore suspended AUMs, let 's change season of use to wipe out cheat grass before it goes to seed, and let 's let our beautiful desert perennials flourish. Let 's allow further water development to fully utilize upland areas and take pressure off our streams and creeks, and let 's see grazing for what it is, sage grouse conservation that works, because it is common sense and good science/ Thank you. The Stewart Family
NV_CA-GRSG-I-217143	Greater sage grouse management plan Nevada	Please find the attached comments regarding the Nevada and Northeastern California greater sage grouse management plan
NV_CA-GRSG-I-217336	2018 sage-grouse EIS WLD comments	Dear BLM, Here are WLD comments on the sage-grouse DEIS, We carry forward all concerns submitted during scoping in this current process. We note the recent Federal District Court ruling that there was no rational reason for the USFWS 's actions regarding listing Bi-state sage-grouse as Threatened. The same certainly seems to apply to this effort to turn the GRSG management into chaos, which is what the DEIS does. Let us know you have received these comments. Katie Fite

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Submission ID	Subject	Submission Text
		Public Lands Director WildLands Defense PO Box 125 Boise, ID 83701
NV_CA-GRSG-I-218195	Greater Sage Grouse Draft RMPA/EIS	Alternative B eliminating SFA designation, Alternative B for habitat designations, GRSG-GEN-GL-101-Guideline, GRSG-LR-SUA-ST-014-Standard, Table ES-2, Table 1-2 in Chapter 1, GRSG-LR-SUA-O-013-Objective, GRSG-LR-SUA-ST-017-Standard, Required Design Features Worksheet in Appendix C
NV_CA-GRSG-I-218753	Christopher Henry Comments2018_07_30	<p>I appreciate the opportunity to comment on the “Nevada and Northeastern California Greater Sage-Grouse, Draft Resource Management Plan Amendment and Environmental Impact Statement”. I am a professional geologist, a researcher with a respected part of a major state university, who has worked and published on geology of the areas under consideration. My comments, which are entirely my own and not official statements from either the university or my specific part, are based on my professional understanding. Because of moderate color blindness, common among men, it is difficult for me to fully understand the alternatives illustrated by the maps in Appendix A. Therefore, my comments focus on the general questions of how best to preserve both sage grouse habitat and access for mineral and energy exploration. Resources in the region include both Gold, which is a major contributor to the Nevada economy and makes the U.S. a leading producer in the World, and such environmentally critical items as Lithium (essential to electric vehicle development) and Geothermal Energy (a sustainable and non-CO2-generating energy resource).</p> <p>The previous Record of Decision, (I think this is now the “No Action” alternative), proposed withdrawing large areas near McDermitt in northern Nevada. Yet these proposed withdrawal areas have significant, identified Lithium deposits, and potential exists for far more deposits. Lithium is required to make Lithium-ion batteries, which will be needed in huge numbers to power electric vehicles and other applications. Removing these Lithium deposits from potential use means severely hampering the nation’s ability to generate a “green economy” and address major concerns such as climate change.</p> <p>Moreover, we still have much to learn about the mineral and geothermal potential of this region. The areas of Lithium mineralization were unknown until the late 1970’s, and even now we have a very limited understanding of their distribution, geologic controls, amount, and origin. By placing even the known areas of mineralization off limits, these restrictions will prevent the exploration and research that are necessary to understand these factors.</p> <p>A prime example of the importance of learning more about mineral deposits is the Carlin trend in northeastern Nevada, a region with major gold production and resources. The Carlin trend and its deposits were unknown until approximately 1960 despite more than 100 years of mineral exploration in Nevada. Now the US is one of world’s leading producers because of the Carlin trend. Mineral and energy production in Nevada in 2013 was a \$9 billion industry and directly employed 17,554 people averaging \$80,725 pay, some of the best paying jobs in the state.</p> <p>Note that the US Geological Survey (Scientific Investigations Report 2016-5089-B) confirmed the significance of Lithium deposits in the McDermitt area. This report showed much of the McDermitt area to have a “High potential, high certainty” for lithium-rich clay (Figure 23E). The USGS report was based on a short-term assessment of potential geologic resources in the areas of withdrawal, drawn only from existing data with no new examination. The full potential of any region can only be known from comprehensive exploration, which would be eliminated by the proposed withdrawals. The history of geologic exploration is people looking in many places and not finding anything until some individual or group sufficiently understands the geologic controls of deposits to identify a resource that occupies a very small part of the overall area of exploration. The fact that even this short-term assessment identified the high Lithium potential shows how significant that potential is.</p> <p>The impact of mineral exploration over the very large area of identified habitat is small, mostly the ability of geologists and others to be in an area, drive on existing roads, hike elsewhere, and inspect geologic features. Impact is greater once a serious exploration target is identified, but those targets are tiny compared to the area of habitat. Although prospective areas are large, individual mineral deposits are small, with surface footprints generally in the range of 10’s of acres to rarely several square miles for larger types of deposits, e.g., some Copper deposits. Again an example from the region of known and potential Lithium resources near McDermitt, Nevada: a potential Lithium mine in this area might cover a few 100’s of acres, and overall development would be much less than 1000 acres. In contrast, and speaking from observation and public data but not as a professional geologist, the Holloway fire of 2012 apparently</p>

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		<p>affected more than 450,000 acres that overlapped significantly with the lithium prospective area. I saw parts of the fire area within a few months after the fire, and no vegetation remained (see accompanying photo). Thus, one major fire decimated sage grouse habitat in an area 450 times the area that would be temporarily affected by mining and would be reclaimed after mining. Based on the assessment of BLM and US Fish and Wildlife Service, this disparity in impact between wildfire and invasive vegetation that will occupy the burned area and geologic resource exploration and development holds true throughout Nevada. Geologic resource exploration and development are not the problem, and withdrawals that greatly reduce them will do effectively nothing to help the greater sage grouse.</p> <p>The mining industry has an excellent record on restoration of mined or otherwise affected lands, e.g., of riparian habitat including far outside their immediate areas of exploration and mining. My impression is that mining companies would also be willing to help with sagebrush and sage grouse habitat. But their willingness to do this is predicated on having a financial interest in a region, i.e., their ability to explore and potentially mine. If they cannot explore in a region, they won't have an interest and they won't be able to help with restoration. One cannot expect any commercial entity to help with issues in regions from which they have been excluded.</p> <p>My recommendation is that these proposed areas not be withdrawn for exploration and development. Instead, efforts to maximize sage grouse habitat should focus on wildfire prevention and restoration of already burned areas.</p> <p>Thank you for your attention. Sincerely, Christopher Henry 1450 Joanie Court Reno, Nevada 89509 chenry@unr.edu</p>
NV_CA-GRSG-I-218756	Strengthen Protections for Sage Grouse -- Nevada-California Greater Sage Grouse RMPA-EIS	Please see attached comments
NV_CA-GRSG-I-218757	Strengthen Protections for Sage Grouse -- Nevada-California Greater Sage Grouse RMPA-EIS	Please see attached comments.
NV_CA-GRSG-I-218776	Preferred Alternative	<p>BLM: What is not discussed in the Management Alignment Alternative are actions needed to address the factors for why the 2015 Final EIS was in violation of NEPA and FLPMA as well as other federal and state statutes. In the court case filed in Nevada it was shown that habitat maps were illegally and arbitrarily altered after the comment period for the DEIS was closed. Let alone the illegal introduction of the bogus SFA concept. Being in violation of NEPA, FLPMA and other statutes, the 2015 RMPA 's are null and void. This 2018 DEIS fails to address this fact.</p> <p>Moreover, in the same court case it was revealed through discovery that 3 federal operatives known as "The Three Grouseketeers" colluded in this illegal activity. What disciplinary action is being taken against these criminals? The court cases included private entities that were impacted with immediate and irreparable harm because of these illegal activities. What is being done to address reparations for these entities?</p>
NV_CA-GRSG-I-218884	Draft RMPA/EIS Review	Comments of Lincoln County Power District No. 1 on the Nevada and Northeastern California Greater Sage-Grouse Draft Resource Management Plan Amendment/Environmental Impact Statement (RMPA/EIS).

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NV_CA-GRSG-I-218885	Nevada Association of Counties Comments on NVCA GRSG DEIS	Please accept the attached comments from the Nevada Association of Counties. Please contact our office at 775-883-7863 with any questions or concerns.
NV_CA-GRSG-I-218891	Comments from The Pew Charitable Trusts	Attached please find comments from The Pew Charitable Trusts on the draft environmental impact statement proposing changes to the Bureau of Land Management's (BLM) 2015 sage-grouse plan in Nevada and California.
NV_CA-GRSG-I-218899	Undefined	Please see attached pdf file of comments on the draft GRSG DEIS.
NV_CA-GRSG-I-218901	May 2018 Sage Grouse RMP and EIS Comment	Please see attached comments. Respectfully submitted, Salmon River Cattlemens Association, Inc.
NV_CA-GRSG-I-218907	Greater Sage-Grouse Conservation Plan	<p>July 31, 2018</p> <p>Dear Forest Service, BLM, and other stakeholders,</p> <p>The priority of the Sage-Grouse Conservation Plan is to conserve an iconic bird species and the habitat it depends upon for its survival in the West. The major emphasis of this plan is conservation, not economic development. Although, if wildlife conservation could dovetail with economic development, this plan could have beneficial impacts for the birds as well as local communities. This plan was created to protect the birds without necessitating Endangered Species Act listing, which would have required a great deal more federal involvement (ESA regulations, etc.). The various stakeholders have put a great deal of time and effort into the creation of this plan already and they want it to be successful.</p> <p>Unfortunately, the currently proposed plan is even weaker than the previous one, which was put in place after consultation with stakeholders including western governors, scientists and conservationists. Further weakening of the original plan, via these proposed amendments, is a slap in the face of all interested stakeholders who have worked so hard to develop this plan to begin with. Additionally, the proposed amendments to this plan appear to be an attempt to put the wants of the gas/oil, mining, and ranching industries over the needs of our wildlife. The states and other stakeholders have an opportunity here to save an iconic species, but only if they work together with a plan that is robust enough to get the job done, namely one that increases the number of the Greater Sage-Grouse range-wide and protects all of its necessary habitat, including sagebrush focal areas.</p> <p>The announced plan revisions, namely the removal of "sagebrush focal areas" from the original conservation plan text, threatens the protections for sage-grouse on millions of acres of public lands. I do not support any proposed amendments to the Greater Sage-Grouse Conservation Plan that would allow new surface disturbances or the opening of these areas (SFA's) to new hardrock mining claims. Weakening protections would have significant consequences for sage-grouse and other wildlife, sagebrush grasslands and the western communities and economies that depend on them. Rather than wasting time on trying to weaken the federal plans, the Trump administration should consider ways to improve them. Scientists have already identified gaps and deficiencies in the current conservation strategy, and have recommended measures to strengthen conservation and management of the species:</p> <ol style="list-style-type: none"> 1. Conserve all of the most important sage-grouse habitat, including Sagebrush Focal Areas within Priority Habitat Management Areas. As an example, winter habitat is particularly important to sage-grouse, mule deer and other wildlife, but the current federal plans fail to protect those areas from harmful land use and development. In the Sagebrush Focal Areas as listed in the original 2015 plan, federal land use plans will avoid new surface disturbance and recommend that the areas be withdrawn from new hardrock mining claims. 2. Connect sage-grouse habitats. The federal government developed fifteen plans covering the sage-grouse 's eleven-state range, but failed to stitch them together into a matrix that can provide for the species across federal jurisdictions and state boundaries. It is essential that these various plans work together and with the federal plan. 3. Protect sagebrush reserves. It is important, particularly in light of climate change, that land managers set aside areas both where sage-grouse are now and where they will need to go in the future; the current conservation plans fail to provide that direction. 4. Reduce manageable impacts in sage-grouse habitat. Some threats to sage-grouse are difficult to manage, such as wildfire and invasive species. The federal conservation strategy should compensate for those impacts by emphasizing management of land uses that we can control, such as improperly managed livestock grazing, which contributes to unnatural fire and the spread of invasive species. 5. Restore degraded sage-grouse habitat. Sage-grouse have already lost nearly half their range to agriculture and development. If there is to be any hope for the

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		<p>different state and federal plans to work together, this loss of habitat must cease. The federal sage-grouse conservation strategy should be updated to support active restoration of areas that can still be used by sage-grouse and other wildlife.</p> <p>I urge you to strengthen this conservation plan, not weaken it, and make it more protective of the sage-grouse. Afterall, it is the sage-grouse that we're all working so hard to protect. Again, I must stress that the main priority of the Sage-Grouse Conservation Plan is the protection of the current population of sage-grouse and a significant increase in the numbers of these birds over their current range throughout the 11 participating states. Any actions that weaken this plan or make it less effective will make recovery of this iconic species even more uncertain.</p> <p>Thank you for this opportunity to express my concerns.</p> <p>Sincerely, LeeAnn Bennett</p>
NV_CA-GRSG-I-218911	Pershing Gold Comments on DEIS for Greater Sage-Grouse Conservation	[LLWO200000.LXSGPL000000 18x.LI 1100000.PH0000]
NV_CA-GRSG-I-218919	See Attached Letter	See Attached Letter
NV_CA-GRSG-I-218927	California Wilderness Coalition comments, 7/31/18	<p>The BLM here in the Golden State has been doing an exemplary job of protecting and restoring greater sage-grouse (GSG) habitat despite receiving insufficient resources from Washington.</p> <p>The lands managed for GSG conservation as priority habitat management areas include some of the most beautiful and ecologically significant landscapes in northeastern California: Skedaddle Mountains, Five Springs Mountain, Shinn Mountain, Tunnison Mountain, Smoke Creek, McDonald Peak and Fitzhugh Creek, among others. These lands are far too important to be opened to development of any kind.</p> <p>We are concerned that the changes proposed in the Nevada and Northeastern California Draft RMPA and EIS, such as the elimination of key habitat protections in Nevada, could further imperil the GSG and its habitat across the region and contribute to its listing under the Endangered Species Act. We request that no amendments or substantial changes be made to the GSG management plan for California or Nevada. These plans were the result of an extended and extensive process to develop a workable framework to conserve the sagebrush ecosystem and permit other ongoing uses of the affected public lands.</p> <p>We urge you to implement the GSG habitat plan for California and Nevada, not weaken it. Thank you for considering our comments.</p>
NV_CA-GRSG-I-218928	Comments Concerning the Draft Resource Management Plan Amendments and Environmental Impact Statement - Nevada and Northeastern California Greater Sage Grouse	Letter dated July 31, 2018, submitted by the Nevada Mining Association (attached).
NV_CA-GRSG-I-218961	NV Chap. BHA Comment on SGMP Revision Draft	<p>This comment is truncated. Please see our attachment.</p> <p>A.) Our Concerns regarding Purpose and Need Statement:</p> <p>1. Governor Sandoval and other Western Governor 's have expressed concerns about the focus and purpose of this review, that it may weaken our stakeholder-developed state plan, currently in implementation. (*Appendix #1) It is our hope that BLM concludes our NV Plan already reflects years of involvement by all agencies and stakeholders and has complete support of our governor.</p> <p>2. Stakeholders, such as the mayor of West Wendover, have spoken publicly about the importance of hewing to our current plan until the 5 year implementation and monitoring process of our current plan is concluded. (*Appendix #2)</p> <p>3. To further diverge from current consistency among state plans has the potential to make it more difficult to objectively demonstrate meaningful conservation</p>

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		<p>at biologically relevant levels which can cross state lines, management zones and ecoregions (Great Basin & Rocky Mountains).</p> <p>3. We cannot support any changes to our NV plan without current peer-reviewed science indicating it will lead to an improved outcome. We do support mechanisms to update the science as needed throughout the implementation process.</p> <p>4. We cannot support changes without current plan monitoring “trigger” data indicating a need for science-supported adaptive mangement.</p> <p>B.) Our concerns re: the review process, listed below, reflect our absolute advocacy of current plans, while acknowledging the import of a mechanism to keep the science up to date and make minor alterations and refinements to increase effectiveness and/or align better with our state plan when shown by current peer-reviewed science to be potentially advantageous to an outcome of conserved/restored SG habitat and continuation of the non-listed status of SG.</p> <p>1. First and most primary: do not alter, change or delay, the current SGMPs during this review process. Continue implementation with all due speed. Since the USFWS decision will be reviewed in 2 short years and is dependent on the success of our plan, we are concerned that this mandated review process has already distracted from, discouraged and/or confused the critical current implementation underway. We stand by our statements of support for our current NV SGMP made in our scoping comments of November 10, 2017.(*Appendix #3)</p> <p>2. “Best available current science”, reassuringly stated often in this document, is essential in management decisions, determining the long-term success of our plan. We request adding management decisions based on science be tied to qualified biologists and accepted methodologies.</p> <p>3. Net conservation gain principle, tied to compensatory mitigation, is a bedrock principle of our SGMP that must not be altered. The preferred alternative description states it shall remain as objective of compensatory mitigation, yet in the same paragraph, red flags are raised that there was inadequate public comment opportunity on the concept and that compensatory mitigation itself may not be appropriate or legal.</p> <p>This concept was thoroughly vetted for years and agreed upon in our SEC stakeholder group. Now fears could be injected into this well-working group, driving stakeholders back into counter-productive separate corners.</p> <p>4. The Conservation Credit System (CCS) is the visionary yet bedrock tool of our NV SGMP for case-specific mitigation of human impacts on SG habitat. It must be validated and enabled by BLM within this review process. The current mitigation project plans between the SEC, ranchers, the mining industry and BLM are in line to be models for all SG habitat throughout the west -- they must not be derailed.</p> <p>5. There must not be exemptions to mitigation. Please clarify with more specifics and definitions as to what are “exemptions criteria”.</p> <p>6. Compensatory mitigation must not be removed as the extremely valuable tool it is for our ranching and mineral resource communities toward maintaining SG habitat health. Language must be added acknowledging BLM ‘s already existing authority to require mitigation in case specific circumstances. Please recognize the requirement in the state plan: “Mitigation will be required for all anthropogenic disturbances (that cannot be avoided) impacting SG habitat within the SGMA.”</p> <p>7. Sagegrouse Focal Areas (SFAs): we recognize this was a concept sprung on the SEC with very short notice for adequate review and public comment, threatening the consensus built within the SEC for their SGMP. That said, we view top-down elimination of the concept with NO public comment to be just as troublesome. Given that the concept has been thoroughly vetted among the top SG scientists, we feel additional time should be allotted for public and SEC consideration, especially as to the adequacy and accuracy of the maps before abandoning this principle which focuses on the key elements of both connectivity and landscape scale view.</p> <p>8. Retain primary conservation/restoration focus on a landscape scale (data supported by USGS). The consistent focus of this review the project level outcomes, while important, minimizes the importance of a landscape scale view, across state boundaries and SG management units, as the primary path to both</p>

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		<p>conservation and restoration of SG habitat. We support the concerns and conclusions of the June letter to Sec’y Zinke by the group of noted wildlife biologists. (*Appendix #4)</p> <p>9. When making project and mitigation decisions, Primary Habitat management Areas (PHMA) and GHMA must be considered a functional unit as connectivity through GHMA is key to PHMA populations.</p> <p>10. BLM should align with the NV Plan language to</p> <p>a.) “Avoid, Minimize, Mitigate”, rather than the proposed “Avoid, Minimize and Compensate”.</p> <p>b.) Require mitigation in all 3 habitat types (PHMA, GHMA & OHMA -- O: other), as expressed in the NV plan, rather than just the first</p> <p>11. The Adaptive Management (AM) process, based in sound science, is both a bedrock principle and tool of the SGMP to ensure effectiveness of conservation and restoration efforts at both the project level and broader landscape level. Consistent application of AM, enhanced by continued updates from current sound-science and monitoring results, will provide the assurance FWS requires for future health of SG and SG habitat.</p> <p>12. Retain the BLM commitment to use the state’s Habitat Quantification Tool through “solidifying” rather than “clarifying” it, while adopting the most current version verified by current best science. A mechanism for updates must be provided.</p> <p>13. Quantitative Habitat Triggers (QHT) must be retained, while systematically refined by monitoring and current science information gained over time. The DEIS is non-specific as to how and how often analysis will be conducted, nor the tool to determine percent decline. To avoid variability and establish consistency, detailed methods, as in the current QHT are already established and must be retained.</p> <p>14. Sound current science supports the maintenance of lek buffers.</p> <p>15. We support the detailed updated GAP report conclusions of May 2018 issued by the Western Association of Fish & Wildlife Agencies (WAFWA) (*Appendix #5) The recommendations should be implemented wherever appropriate to attain most effective conservation /restoration.</p> <p>16. Conservation/restoration success depends upon ensuring enforcement of WHB Act implementation direction to manage HMAs to AML.</p> <p>17. Clarification of the habitat objectives table (2.2) can and should be achieved via policy & training. Measurable residuals at the end of the growing season must continue to be an objective. Improve livestock management through continued or increased emphasis on desired conditions rather than process/prescription.</p> <p>18. Ensure adequate timely funding of our NV SGMP.</p> <p>In Conclusion: The May 15, 2018 court ruling on Bi-state Sage Grouse MP against the FWS non-listing decision (* Appendix #6) gives us grave concern for the FWS conclusion on our plan in 2020. It is our hope this current MP revision review will not alter the key protection measures, made through science-based open deliberations, which are the heart of our successful plan and of the FWS “does not warrant listing” decision. These hard-fought, thoroughly studied, science-based provisions in our NV plan, now subject to review, must not be weakened and lead to a reversal of the FWS decision.</p> <p>We remain convinced that most, if not all, future tweaking and adjusting of our plan to comply with new science-based information, can be done by plan</p>

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NV_CA-GRSG-I-218984	Sierra Club Toiyabe Chapter Comments	Comments included as attachment.
NV_CA-GRSG-I-218985	NV Chap. BHA Comment on SGMP Revision Draft	<p>Please excuse if this is the second time you've received this. I was unsure if it went through or not.</p> <p>Please refer to our comments in the attachment.</p> <p>Karen Boeger</p>
NV_CA-GRSG-I-218991	Nevada Farm Bureau Comments To Draft EIS	The attached document is Nevada Farm Bureau's input in response to the Draft Nevada and Northeastern California Draft Resource Management Plan Amendment and the Draft Environmental Impact Statement for Greater Sage Grouse
NV_CA-GRSG-I-219007	Comments on the BLM NV & Northeastern CA RMPA & EIS	Nye County, Nevada Comments on the BLM Nevada and Northeastern California Draft Resource Management Plan Amendment (RMPA) and Draft Environmental Impact Statement (EIS)
NV_CA-GRSG-I-219018	Undefined	Please see the attached comments on the GSG DEIS for NV&CA.
NV_CA-GRSG-I-219022	WWP et al. 2018 comments	The attached comments are being submitted in response to the Bureau of Land Management's Nevada and Northeastern California Greater Sage-grouse Draft Resource Management Plan Amendment (DRMPA) and Draft Environmental Impact Statement (DEIS). The following comments are being submitted on behalf of the members of Western Watersheds Project, Prairie Hills Audubon Society, Center for Biological Diversity, Advocates for the West, American Bird Conservancy, WildEarth Guardians and the Sierra Club. We incorporate by reference all previous comments, protests, and litigation filings pertaining to any of BLM's Greater sage-grouse planning efforts.
NV_CA-GRSG-I-219023	Uncertainty Continues with LUPA Revisions	<p>I write as an environmental professional, working specifically in the mining industry over the past 35 years. For the past seven years I have worked for a succession of junior mining companies that have opened a small open-pit mine on BLM lands in eastern Nevada, and have been in the process of permitting a second mine near to the first. The NEPA process for the first mine took just under two years. For the second mine, we anticipate a record of decision by the end of September, but only after numerous delays, including the 2015 Greater sage-grouse decision, that have resulted in a six year NEPA process. For the first mine we have stipulations related to Greater sage-grouse habitat and we are in negotiation on the mitigation for the second mine. As a result, I have followed the regulatory environment and science related to Greater sage-grouse for more than five years. It is from this experience I write today.</p> <p>INCORPORATION OF STATE PLANS</p> <p>I support the change of approach demonstrated in the 2018 EIS, specifically the effort to incorporate state plans. Habitat extent and needs, along with economic realities, vary between states. The state plans more closely accommodate local needs. While we may have concerns about the Nevada state plan, we do find it more open to on-the-ground data and "best available science" where local data have been collected.</p> <p>SAGE-BRUSH FOCAL AREAS</p> <p>Removing the Sage-brush Focal Areas (SFAs) is an important recognition of law and procedure. Introducing it without notice in the final EIS was not procedurally appropriate as the public (or states) never had a chance to comment. In addition, the SFAs were introduced without a proper economic or geologic analysis. Both of these steps are required by NEPA.</p>

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		<p>MITIGATION</p> <p>The Instruction Memo IM2018-093 released July 24, 2018 seems to contradict mitigation planning provided in the EIS and specifically in Appendix F: Mitigation Strategy. We need clarification if the IM specifically delegates mitigation to the state offices or if the strategy in Appendix F will be reissued.</p> <p>Mitigation is an important part of a proponent’s planning to account for impacts and improve the environment as a result of a proposed project. Mitigation is not, and never has been, inexpensive. Uncertainty over mitigation adds time and cost and, therefore, makes some projects uneconomic. In general, uncertainty impacts our ability to attract investors because costs are not clear. Any policy that is unclear or that invites lawsuits (whether or not the court agrees with the plaintiff’s argument) inserts more uncertainty. Uncertainty should be avoided.</p> <p>While Appendix F clearly defines relevant terms, there are no references to assist the public in understanding the scientific basis or for further research, especially into state programs mentioned in the text</p> <p>ADAPTIVE MANAGEMENT</p> <p>Appendix D is apparently a re-write of Appendix J in the 2015 FEIS. Sadly, the re-write is internally inconsistent and seems less concerned with evolving science than the 2015 version. The following examples show this move from a process anchored in scientific research to a reliance on experts, and less trust/engagement of the public:</p> <ul style="list-style-type: none">- As stated in the text: In Appendix J (2015) hard triggers could be determined by the appearance of collective soft triggers, whereas in Appendix D (2018) only accelerated criteria are used for hard triggers.- Appendix D (2018) does not refer to the methodologies for collecting data on population that were provided in Appendix J (2015). Instead of data collection as described in Appendix E (2015), responsibility for establishing population counts are delegated to the state agencies and the National Operations Center.- For habitat data (sage brush coverage), text in Appendix D (2018) specifically refers to “imagery” though it is well documented that there are many difficulties in interpreting satellite imagery accurately and this specification suggests that new technologies won’t be acceptable, if developed.- Appendix J (2015) refers to the cutting-edge work being done on genetic studies and accounting for the use of alternative leks by Greater sage-grouse, but Appendix D (2018) does not. Fedy and Aldredige 2011 cited in Appendix J (2015) is not mentioned in Appendix D (2108).- Appendix D (2108) eliminates the concepts of “seasonal habitat” and “space-use models” incorporated into the analyses recommended in Appendix J (2015).- The number of biologically significant units (BSU) have been reduced from 17 in Appendix J (2015) to only 7 in Appendix D (2018). While this may be an appropriate change, there is no reference to indicate who changed the units or why. <p>Neither Appendix J (2015) or Appendix D (2018) have provided reference lists. For Appendix D (2018) there are four references (fewer than the seven in Appendix J). The following citations need full references to make the appendix of use to the public: Coates et al. 2017; DOI 2008; Stiver et al. 2015; and BLM 2015. The following references were dropped from Appendix J (2015) that likely would add significant science to the process: Coates et al. 2014 (updated by 2017?); and Connelly 2004; DOI 2008; Fedy and Aldridge 2011; Stiver 2006 (updated by 2015?); and USFWS 2013.</p> <p>Coates et al. 2017 is mentioned numerous (5) times and appears to be the back bone of Appendix D (2018). However, nowhere in the appendix is the reader given a title or co-authors to help determine which of the 7 papers authored by Coates in 2017 are being invoked (at least four have Greater sage-grouse in</p>

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		<p>the title). The reference list for the 2018 EIS in general may have the proper reference but again, Coates was involved in numerous publications (BTW the reference list does not have Coates et al. 2017a though it is referred to in the text, pages 3-2 and 3-3). There is no mention of the EIS reference list in this appendix text to direct the reader to consult it.</p> <p>Previous efforts to identify sources mentioned within the EIS (2015) have found that the reference list is incomplete or confusing (see discussion on Noise below). A professional organization should realize that appendixes should stand on their own as they are often separated from the body of the original document. This is poor documentation and unacceptable for transparency to the public to which the BLM claims to aspire.</p> <p>ROLE OF SCIENCE&mdash;PREDATORS AND NOISE</p> <p>Sadly, two important issues were eliminated from further study in the 2018 EIS&mdash;predators and the impacts of noise on Greater sage-grouse. Predation has been shown to be a significant factor in Nevada (Coates et al. 2007*, followed by multiple papers since and as recent as 2016). The rapid increase of predators in Nevada has been linked to land management and anthropogenic changes that the BLM should consider in future decisions, even if raven management is not practical. *[Efficacy of CPTH-treated egg baits for removing ravens]</p> <p>I also wish to protest the failure to re-engage on the noise limitations (Appendix K, 2015 FEIS). This regulation is not based on science. In fact, inclusion of Amstrup and Phillips 1977 based on a comment, shows that science is not the motivation for this regulation; given that the statement supported by this citation states that noise does not diminish rapidly with distance, whereas noise does diminish in a predictable manner, following fundamental rules of physics. The BLM's 2015 FEIS addresses noise on pages 4-16 to 4-18. However, none of the references cited in these sections are studies with stated hypotheses related to noise or identify specific noise levels that cause harm to the Greater sage-grouse. Many of the studies cited have no specific data on noise, and nearly all of them are merely speculative or cite other documents that also do not have any data regarding impacts of noise on Greater sage-grouse. About two-thirds of the references actually mention Greater sage-grouse, though many are not directly related to noise, and none appear to have actual field data related to noise and Greater sage-grouse.</p> <p>Most basic to a scientific-based argument is to cite the references used to build an argument precisely enough that the reader can fact check your interpretation of previous work. The exercise of trying to determine at what levels noise affects Greater sage-grouse and to verify the argument for regulating noise is complicated by the fact that the reference list in the FEIS (2015, provided in Chapter 7) is not complete or consistent (Patricelli et al. 2013; Blickley and Patricelli 2012/2013?; Patricelli and Blickley 2012) with the citations provided in these short two pages. Further, not all references are easily obtainable (Amstrup and Phillips 1977; Kaiser 2006; Blickley and Patricelli 2012/2013?; Patricelli and Blickley 2012). These failings violate requirements of the Data Quality Act.</p> <p>Failures such as not anchoring regulations in science, and compounding that by not making the science used available to the public, only invite lawsuits and leave project proponents with little trust that their expenditures actually have an impact on the environment as we would hope.</p>
NV_CA-GRSG-I-219040	American Bird Conservancy Comment Letter	<p>Thank you for the opportunity for American Bird Conservancy to comment on the draft Nevada and Eastern California Greater Sage-Grouse Resource Management Plan Amendment and Environmental Impact Statement. American Bird Conservancy has been participating in the region-wide planning initiative since its inception, and we are concerned that the proposed changes to Greater Sage-Grouse conservation plans in Nevada and Eastern California and other states have the potential to put the grouse at greater risk and increase the prospect of sagebrush habitat loss.</p> <p>The purpose of this comment is to provide input to ensure that the Greater Sage-Grouse no longer suffers severe population declines and habitat loss. We are concerned about the piecemeal review of a region-wide initiative and the potential for uneven management of Greater Sage-Grouse habitats and populations in each state; there needs to be clear and consistent approaches to grouse management. The needs of the Greater Sage-Grouse do not change from state-to-state, therefore American Bird Conservancy urges for more uniform management across the region.</p> <p>This can be accomplished through incorporating the standards in the conservation checklist which has been attached for your convenience into each of the</p>

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		<p>draft resource management plans. We request that the Bureau withdraw and then revise the draft RMPA/EIS for Nevada and Eastern California to include this conservation alternative, not just a No-Action Alternative or a Preferred Management Alignment Alternative.</p> <p>American Bird Conservancy notes the instances where the Nevada and Eastern California plan does not follow the management recommendations of scientists, leaving open the potential for further habitat loss or degradation. American Bird Conservancy is further concerned that important processes including mitigation and adaptive management to safeguard against habitat loss are being weakened or eliminated.</p> <p>The removal of Sagebrush Focal Areas (SFAs) Designation is a concerning issue we want to address. Under the No-Action Alternative, 2,767,552 acres would be designated at SFAs and the Greater Sage-grouse and its habitat would be shielded from harmful mining activity. Conversely, under the Bureau’s Preferred Management Alignment Alternative, there is no such designation, and lands would be identified as PHMAs, GHMAs, or OHMAs instead. The Bureau wants to make it clear that SFA mineral withdrawal has been cancelled and that there is a justified reason for the cancellation. However, such a habitat designation is needed to adequately maintain conservation of the Greater Sage-Grouse. The Bureau’s preferred habitat management area designation does not necessarily provide the strongest form of protection. Therefore, we believe a stronger form of protection can be created in according to the conservation alternative.</p> <p>Moreover, American Bird Conservancy would like to address the Allocation Exception Process. Under the No-Action Alternative, there were different kinds of allocation standards for different resource developments in PHMAs outside of SFA. For geothermal, salable minerals, oil and gas, and wind energy, there needs to be a conservation net gain whenever there is development. This goes for land tenure and recreational development, as well. In some instances there needs to be scientific support for the allocation of the lands, and if the development does not meet an exception, PHMAs are closed off to it.</p> <p>Now under the Preferred Management Alignment Alternative, the allocation standards are different. First, there are no separate guidelines for the different forms of development for allocation. Instead, the State Director may grant an exception to the allocation if proposed development meets ones on of the flimsy criteria required for authorization. Second, the criteria does not emphasize the need for conservation net gain. Unlike the No-Action Alternative that required a clear conservation gain for the Greater Sage-Grouse, the Bureau’s preferred alternative’s lack of emphasis on a net conservation gain for allocation weakens conservation efforts for the Greater Sage-Grouse and its habitat. It would allow third parties to come into PHMAs and GHMAs and disregard the need to preserve the grouse when it attempts to develop the lands. Redefining the guidelines under the Allocation Exception Process with elements of the conservation alternative would hold third parties up to a higher standard when they decide to encroach into Greater Sage-Grouse habitats.</p> <p>We would like to highlight the Adaptive Management presented in the draft, as well. Soft and hard triggers would be used to monitor disturbances under the No-Action Alternative. Once a soft trigger is reached under this alternative, the Bureau would identify the causal factor and apply adaptive management to alleviate the causes of the decline in populations or habitat quality. Also, the Greater Sage-Grouse populations and its habitat would be monitored annually, and if the causal factor is not readily discernable, an interdisciplinary team would identify the appropriate mitigation or management actions in a timely manner.</p> <p>Now if a hard trigger is reached under the No-Action Alternative, the WAFWA Management Zone Greater Sage-Grouse Conservation Team would determine the cause, project level responses, and investigate the appropriate response. Then a plan amendment process may be initiated as a response. On the other hand, the Preferred Management Alignment Alternative completely revises soft and hard population triggers in accordance USGS’s Hierarchical Population Monitoring of Greater Sage-Grouse in Nevada and California—Identifying Populations of Management at the Appropriate Spatial Scale. Also, the Bureau’s Adaptive Management will incorporate elements of the Nevada’s Conservation Plan, and the established triggers will be removed when recovery criteria has been met. The revision, and potential removal, of the triggers under the preferred alternative can leave the Greater Sage-Grouse and its habitat vulnerable to the consequences of mineral development.</p> <p>The Bureau’s preferred alternative does not possess a strong enough threshold to gage how the Greater Sage-Grouse is doing in the area. As a result, this will weaken the Bureau’s response to any declines in the population and habitat. American Bird Conservancy views an Adaptive Management that includes triggers and is run in accordance with the conservation alternative as a way to improve protection of the Greater Sage-Grouse and its habitat.</p>

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		<p>Finally, we would like to note the Mitigation Strategy issue. The two alternatives for the strategy presented in the draft are similar, but there's one major different. The Mitigation Strategy in the Preferred Management Alignment Alternative aligns more with the State of Nevada's mitigation strategy. This means that when determining the impacts, the Bureau would use Nevada's Habitat Quantification Tool (HQT) to ensure consistency in tracking and reporting to habitat quality and quantity. Also, mitigation options would be assessed using the HQT under this alternative. This is different from the No-Action Alternative that relied heavily on just Nevada's Conservation Credit System to gage compensatory mitigation. While the inclusion of the HQT is a step in the right direction in setting a better mitigation strategy, adding elements of the conservation alternative would create a more protective Mitigation Strategy and allow the Bureau and parties to properly respond to problems facing the Greater Sage-Grouse.</p> <p>Due to weaknesses in the management standards included in the federal plans, adaptive management, including the use of hard triggers, and mitigation using a net conservation benefit standard are necessary to ensure effectiveness and that grouse are being conserved. Recent policy changes to eliminate mitigation requirements on projects effecting federal lands, and changes to the Instructional Memorandum for adaptive management and mitigation, including no longer avoiding leasing oil and gas in priority sage grouse habitat, have eliminated essential safeguards and backstops, and increase the risk of endangerment.</p> <p>The Greater Sage-Grouse conservation plans identify the most important sagebrush habitat, but fall short on avoiding future impacts by not designating reserve areas where no further disturbance to grouse habitat would be allowed. Development and use of priority Sage Grouse habitat is allowed to continue with some important exceptions and limitations, provided that any unavoidable impacts will be mitigated. As a result, the mitigation policy was critically important to ensuring that the Sage Grouse conservation plans are a success.</p>
NV_CA-GRSG-I-219054	Women's Mining Coalition's Comments on BLM's NOA Draft EIS Greater Sage Grouse Conservation	Attached please find comments from the Women 's Mining Coalition on BLM 's Draft EIS on Greater Sage-Grouse Conservation
NV_CA-GRSG-I-219057	Re: 2018 NVCA GRSG Draft RMPA/EIS	<p>Dear Mr. Magaletti,</p> <p>This comment contains 151 comments from individual citizens and members of The Wilderness Society in state (please see the attached PDF with comments). The comments support keeping the core commitments of the plans intact. We expect the BLM will read and count these comments.</p> <p>Thank you, Kim Stevens The Wilderness Society</p>
NV_CA-GRSG-I-219067	Re: 2018 NVCA GRSG Draft RMPA/EIS	<p>Dear Mr. Magaletti,</p> <p>This comment contains 4,326 comments from individual citizens and members of The Wilderness Society nationally (please see the two attached PDFs with comments, posted as two comments here). The comments support keeping the core commitments of the plans intact. We expect the BLM will read and count these comments.</p> <p>Thank you, Kim Stevens The Wilderness Society</p>
NV_CA-GRSG-I-219076	Comments of AEMA	Attached are the comments of the American Exploration & Mining Association on NVCA GRSG DEIS 201805_508.
NV_CA-GRSG-I-219078	Comments - Lithium Nevada Corp.	Lithium Nevada Corp. comment letter, dated August 2, 2018, is attached.

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NV_CA-GRSG-I-219080	Comments from The Wilderness Society et al.	Attached are comments on the Nevada Draft EIS submitted by The Wilderness Society, National Audubon Society, Western Values Project, National Wildlife Federation and Natural Resources Defense Council along with the 2 referenced attachments.
NV_CA-GRSG-I-219080	Comments from The Wilderness Society et al.	This is attachment 2 to the comments submitted by The Wilderness Society, National Audubon Society, Western Values Project, National Wildlife Federation and Natural Resources Defense Council.